

0038

552380

MR. WALES: I'm Richard Wales. I'm with

8 California Community Health Advocates.

9 While reading the Draft EIS and its bandaid,

10 the Supplement to the Draft EIS, I realized that what I

11 was reading was not a statement of environmental

12 impacts relative to a nuclear waste repository at Yucca

13 Mountain, but a construction plan. The fact that no

14 one at DOE knows whether the site will actually work,

15 even at the level of a dirt-moving construction plan,

16 until excavation is complete, is not a good sign. DOE

17 is explaining to us that all the test tunnels and

18 borings did not provide conclusive evidence that Yucca

19 Mountain is indeed a suitable site for a nuclear waste

20 repository.

21 It's very obvious that no one at DOE cares

22 whether there are environmental impacts or not.

23 Indeed, the DOE cares only to present the Bush

24 Administration with a hole in the ground to dump

25 nuclear waste so General Electric, Westinghouse,

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1 Bechtel, and others, can sell turnkey nuclear power

2 plants overseas, and in the USA, if possible. Of

552380

3 course, the taxpayers would foot the bill and take all
4 the risks to ensure these special interests a legal
5 place to shod themselves of their deadly by-products.
6 It's hard to believe that the DOE, the Bush
7 Administration, or their corporate buddies would really
8 care if the nuclear wastes were simply dumped in some
9 Iowa cornfield, if they could get away with it. Your
10 construction plan doesn't measure up to standard
11 industrial requirements, much less a repository for the
12 most dangerous physical substances on Earth. Which of
13 you would buy a house designed with as many unknowns in
14 the engineering and design as your proposed project in
15 Yucca Mountain? Not one of you.

16 I design and install industrial automation
17 projects for a living, and if I seriously proposed that
18 a customer of mine pay me money for a project as
19 ambiguous as this window dressing of yours, I don't
20 know if I would be laughed out of the room or thrown
21 out, but there is no way I would win a project.

22 I want to object on record to a finding that
23 Yucca Mountain is a suitable location for a geologic
24 repository for the disposal of spent nuclear fuel and
25 high-level radioactive waste. I make this objection

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552380

1 because your own Draft Environment Impact Statement,
2 the supplement to the Draft EIS, Yucca Mountain Science
3 and Engineering Report and references CRWMS M&O 2000cx,
4 CRWMS M&O 2000cy, CRWMS M&O 2000cz, CRWMS M&O 2000da,
5 CRWMS M&O 2000db, where your own staff and independent
6 study groups complain that the studies are not complete
7 relative to the containers and drip shields which are,
8 in your own words, heavily relied on to isolate
9 radionuclides from the environment. The issues are
10 many -- welds, testing methodology, and testing
11 inconsistencies, to name a few. Laughably, you go on
12 to great lengths to justify analog comparisons which,
13 of course, is a well established and valid
14 investigative technique, and then after misusing the
15 tool by trying to apply it to a drip shield, which is a
16 cheap engineering tool, you are reduced to offering at
17 Table 4-1 in the Yucca Mountain Engineering Report,
18 under the information from analogs column, "Potential
19 drip shield analog at Japanese archaeological site."
20 One of your many problems started with Table 5-3 from
21 the Draft EIS, with the confidence and significant
22 columns. It doesn't look good for you when the

552380

23 confidence and the modeling is low for seepage into

24 drifts, dripping onto waste packages, transport of

25 radionuclides through the unsaturated zone, which is

0041

1 rated as low in column two, "Confidence in the models

2 to reasonably represent the impacts and processes," and

3 rated high in the third column, "Significance of

4 uncertainty to the estimate of performance." Enter the

5 drip shield and the supplement to the Draft EIS. The

6 objections from the NRC to the DOE are multitudinous

7 and some references are listed below. But the work

8 that DOE has been commissioned to accomplish has not

9 been completed, as made manifests in their own

10 documentation.

11 I want this information in the record for

12 future litigation purposes, if possible. I really

13 don't understand why the state of Nevada has not

14 commissioned scientists and engineers to show your

15 studies up for the political effort that they really

16 are. Debunking your proposal would not be hard to do

17 considering the low quality of your investigations, and

18 documentation, rife with inconsistencies and with the

19 major focus on timely completion -- your words -- at

20 the expense of good science and good conscience.

552380

21 Thank you.